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FRANK FERRARA and CHARLIE FERRARA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

CORY SPENCER, an individual; DIANA
MILENA REED, an individual; and
COASTAL PROTECTION RANGERS,
INC., a California non-profit public
benefit corporation,

Plaintiff,

vs.

LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including but not
limited to SANG LEE, BRANT
BLAKEMAN, ALAN JOHNSTON AKA
JALIAN JOHNSTON, MICHAEL RAE
PAPAYANS, ANGELO FERRARA,
FRANK FERRARA, CHARLIE
FERRARA; CITY OF PALOS VERDES
ESTATES; CHIEF OF POLICE JEFF
KEPLEY, in his representative capacity;
and DOES 1-10,

Defendants.

Case No. 2:16-cv-2129

Judge: Hon. S. James Otero
Ctrm: 10C

Magistrate Judge:
Hon. Rozella A. Oliver

**DECLARATION OF COURTNEY
SERRATO IN SUPPORT OF
FRANK FERRARA'S AND
CHARLIE FERRARA'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR EVIDENTIARY
SANCTIONS**

Complaint Filed: March 29, 2016
Trial Date: December 12, 2017

I, Courtney Serrato, declare as follows:

1. I am an attorney at law duly licensed to practice before the United States District Court for the Central District of California and I am an Associate with the law firm of Bremer Whyte Brown & O'Meara LLP ("BWBO"), counsel of record for Defendants FRANK FERRARA and CHARLIE FERRARA (hereinafter the

1 “Ferraras”) in this action. Except for those facts stated upon information and belief, I
2 have personal knowledge of the facts set forth in this declaration and, if called as a
3 witness, could and would competently testify to such facts under oath.

4 2. I have spoken with representatives of Advanced Discovery Company,
5 the forensic firm retained by Frank and Charlie Ferrara, regarding the facts stated in
6 Alex Morales’ Declaration.

7 3. The representatives of Advanced Discovery have confirmed the
8 declaration is accurate and prepared for Mr. Morales’ signature.

9 4. On October 5, 2017 I made numerous attempts to contact Advanced
10 Discovery to obtain Mr. Morales’ signature to the declaration, but was unable to do
11 so before 6:45 p.m.

12 5. It is my understanding and belief that Mr. Morales will sign the
13 declaration filed with the Court in the immediate future.

14 6. Counsel for the Ferraras will file the signed declaration as soon as it is
15 received.

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17 Executed this 5th day of October, 2017, at Newport Beach, California.

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Courtney Serrato

PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 20320 S.W. Birch Street, Second Floor, Newport Beach, California 92660.

On October 5, 2017, I served the within document(s) described as:

DECLARATION OF COURTNEY SERRATO IN SUPPORT OF FRANK FERRARA'S
AND CHARLIE FERRARA'S OPPOSITION TO PLAINTIFFS' MOTION FOR EVIDENTIARY
SANCTIONS

on the interested parties in this action as stated on the attached mailing list.

☒ (BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth on the attached mailing list. I placed each such envelope for collection and mailing following ordinary business practices. I am readily familiar with this Firm's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service on that same day, with postage thereon fully prepaid at Newport Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ (BY ELECTRONIC SERVICE) Complying with Code of Civil Procedure § 1010, I caused such document(s) to be Electronically Filed and Served through the _ for the above-entitled case. Upon completion of transmission of said document(s), a filing receipt is issued to the filing party acknowledging receipt, filing and service by 's system. A copy of the filing receipt page will be maintained with the original document(s) in our office.

Executed on October 5, 2017, at Newport Beach, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Kimberly Macey
(Type or print name)


(Signature)

Cory Spencer v. Lunada Bay Boys et al.,

Case No. 2:16-cv-2129-SJO

BWB&O CLIENT: Frank and Charlie Ferrara
BWB&O FILE NO.: 1178.176

SERVICE LIST

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